

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

ALETHEIA DIGITAL, LLC,

Plaintiff,

v.

NADINE KARNER and

J2 MARKETING, LLC,

Defendants.

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CIVIL ACTION FILE  
NO.: 4:25-CV-00066-CDL

**PROPOSED SCHEDULING AND DISCOVERY ORDER**

In accordance with Rule 26, the Court's Rule 16 and 26 Order (ECF No. 4), and the Court's Order Granting Plaintiff's Motion to Conduct Jurisdictional Discovery (ECF No. 11), the parties held a telephonic Rule 26(f) conference on March 31, 2025, and conferred to develop and hereby jointly submit the following Proposed Scheduling and Discovery Order (the "Proposed Order"). This Proposed Order encompasses the jurisdictional discovery phase only, and will be amended and supplemented, if necessary, following the adjudication of Defendants' Motion to Dismiss. (ECF No. 5.)

**I. PROCEDURAL HISTORY:**

Complaint filed:	2/6/2025
Removed by Defendants:	2/19/2025
Defs.' Mot. to Dismiss	2/28/2025
Pl.'s Resp. to Mot. to Dism., & Pl.'s Mot. for Jur. Discovery	3/21/2025
Order Granting Jur. Discovery and Requiring Discovery Conf. and Plan	3/24/2025

**II. LEAD COUNSEL:**

**A. For Plaintiff:**

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David C. Rayfield  
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**B. For Defendants:**

Carter P. Schondelmayer  
Tyler C. Cashbaugh  
**Page, Scrantom, Sprouse, Tucker & Ford, P.C.**  
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**III. JURISDICTIONAL DISCOVERY PLAN AND DEADLINES:**

The jurisdictional discovery period began on March 31, 2025, upon the Parties' Rule 16/26 Conference after the Court's grant of Plaintiff's Motion to Conduct Jurisdictional Discovery. (ECF No. 11.)

Plaintiff served jurisdictional discovery requests on Defendants that became effective on March 31, 2025. Defendants' responses to the discovery and Defendants' corresponding production are due April 30, 2025. Defendant served jurisdictional requests on Plaintiff on March 31, 2025. Plaintiff's responses to the discovery and the corresponding production are due April 30, 2025.

The parties will confer on mutually agreeable dates for Plaintiff to take the depositions, for jurisdictional discovery purposes, of Erik Johnson, Nadine Karner, and of J2 Marketing, LLC under

Rule 30(b)(6). These depositions may be conducted remotely, but nothing shall prevent counsel from appearing in person at the deposition, provided notice is given of attendance in-person when the deposition is scheduled. Plaintiff and Defendant reserves the right to identify additional witnesses for deposition as jurisdictional discovery proceeds.

As previously ordered by the Court (ECF No. 11), jurisdictional discovery shall be completed by May 30, 2025. Plaintiff shall file a supplemental brief opposing Defendant's motion to dismiss based upon lack of personal jurisdiction within 21 days, that is, by June 20, 2025. Defendants shall file any response to that supplemental brief within 21 days of service of Plaintiff's supplemental brief.

#### **IV. ESTIMATED COSTS OF DISCOVERY**

**A. For Plaintiffs:** \$10,000

**B. For Defendants:** \$10,000

#### **VII. CERTIFICATION OF COUNSEL**

The parties certify, through the signatures of their respective counsel below, that they have conferred and discussed the nature and basis of their claims and defenses and the possibilities for prompt settlement or resolution of this case, pursuant to Federal Rule of Civil Procedure 26(f).

This 2<sup>nd</sup> day of April, 2025.

##### **Counsel for Plaintiff:**

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##### **Counsel for Defendants:**

/s/ Carter P. Schondelmayer  
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SO ORDERED, this 3rd day of April, 2025.

S/Clay D. Land  
CLAY D. LAND  
UNITED STATES DISTRICT JUDGE